



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW  
ATLANTA, GEORGIA 30303-8960

August 12, 2021

Via Delivery as Email-attachment

Mr. Prashant K. Gupta  
Honeywell, Inc.  
115 Tabor Road  
Morris Plains, NJ 07950

Dear Mr. Gupta:

The purpose of this letter is to approve your submission of the "Revised Supplemental Site Characterization Work Plan for Operable Unit 2: Cell Building Area Surface Soil, dated June 2021" (hereinafter referred to as the OU2 Surface Soil Work Plan). The OU2 Surface Soil Memo is a document to be used in providing information for the full Remedial Investigation and Baseline Risk Assessment Report as required under the 1995 Administrative Order by Consent.

In addition, the following documents were submitted: the "Supplemental Field Sampling Plan for Operable Unit 2: Cell Building Area Surface Soil", the "Amendment #1: Quality Assurance Project Plan for Operable Unit 2, Site Characterization of the Cell Building Area", and the "Revision 1 Health and Safety Plan for Operable Unit 2: Cell Building Area Characterization" (all dated June 2021). All four documents combined provide the information needed and respond to EPA and GEPD comments adequately and are accepted as final for the OU2 Surface Soil Work Plan. It is important to note that none of the documents are true "stand alone" documents and that only combined do they meet the full requirements for the OU2 Surface Soil Work Plan.

EPA did note concerns with certain portions of the documents that will need to be addressed in future sampling and field work documents. Those concerns are cited below. If you have questions regarding the above, please contact me at (404) 562-8506 or [pope.robert@epa.gov](mailto:pope.robert@epa.gov).

Sincerely,

**ROBERT POPE**

Digitally signed by ROBERT POPE  
Date: 2021.08.12 15:06:53 -04'00'

Robert H. Pope, Senior Remedial Project Manager  
Restoration & Sustainability Branch  
Superfund and Emergency Management Division

Enclosure

cc: Melanie S. Jablonski, Georgia Power  
James Schaeffer, BP Corporation  
J. McNamara, GAEPD

**EPA REVIEW OF THE  
SUPPLEMENTAL SITE CHARACTERIZATION WORK PLAN FOR  
OPERABLE UNIT 2: CELL BUILDING AREA SURFACE SOIL  
DATED MARCH 2021**

**LCP CHEMICALS SITE  
BRUNSWICK, GEORGIA**

**GENERAL COMMENTS**

**Evaluation of the Response to General Comment 4:** Future Work Plans should state that the risk-based screening criteria to which laboratory analytical results will be compared are presented in Worksheet #15 of the QAPP Amendment.

**Evaluation of the Response to General Comment 5:** Future Work Plans should state that SOPs to support the field tasks can be found in Appendix A of the QAPP Amendment.

**Evaluation of the Response to Specific Comment 1:** Future Work Plans should include in Section 2 (Overview of the Work Performed to Date in the CBA) information to clarify how the historical data inform the current scope of work.

**Evaluation of the Response to Specific Comment 4:** Future Work Plans should have more detail regarding IDW to ensure proper implementation of the procedures by the field team. For example, how IDW will be sampled, what type of samples will be collected (e.g., grab or composite), how many samples will be collected, and what the analytical suite for disposal includes. Future Work Plans should also describe more fully how mercury contaminated IDW will be stored, sampled (if applicable), and disposed.

**Evaluation of the Response to Specific Comment 5:** Future Work Plans should clearly address if a data usability or data assessment report will be prepared, describe what will be included in the report, and explain how data usability will impact conclusions and recommendations.

**NEW COMMENTS ON THE AMENDMENT #1: QUALITY ASSURANCE PROJECT PLAN  
FOR OPERABLE UNIT 2, SITE CHARACTERIZATION OF THE CELL BUILDING AREA,  
DATED JUNE 2021**

**SPECIFIC COMMENTS**

1. **Worksheet #3 and 5, Project Organization and QAPP Distribution, Page 12:** The project organization chart shows a line of authority between the Project Manager and the Quality Assurance Officer/Project Database Manager; however, the quality assurance (QA) role should be independent of all data collection activities (i.e., the Project Manager should not direct QA personnel). In addition, the project organization chart does not include other QA personnel, such as the data validator. Future QAPPs should provide the project organization chart to include all QA roles on this project and to show their independence.
2. **Worksheet #6, Communication Pathways, Page 14:** This worksheet does not include the form of communication (e.g., telephone, email) or timeframe for notifications (e.g., within 24 hours)

for any of the communication drivers listed. In addition, the communication procedures do not specify that regulatory agencies will be notified of significant corrective actions or when changes to the QAPP Amendment occur in the field. Future QAPPs should revise this worksheet to include the information discussed in Section 2.4.2 (Communication Pathways) of the UFP-QAPP Manual.

3. **Worksheet #9, Project Planning Session Summary, Page 15:** It is unclear why this worksheet has not been completed. For example, a meeting was held on March 24, 2020, to discuss comments on the OU2 Site Characterization Summary Report, dated February 2020. As another example, a meeting was held on October 13, 2020, to review the preliminary groundwater data results from the most recent (at the time of the meeting) groundwater sampling event and the project schedule. Worksheet #9 should document the project planning sessions held during the planning phase of the project. Future QAPPs should revise this worksheet to discuss all project planning sessions, including any action items, held prior to the development of this QAPP Amendment in accordance with Section 2.5 (Project Planning) of the UFP-QAPP Manual.
4. Future QAPPs should provide a more detailed CSM. Further, future QAPPs should revise the DQOs to provide additional information regarding the decision process and objectives based on the EPA's Guidance on Systematic Planning Using the Data Quality Objectives Process, EPA QA/G-4. Finally, it is recommended that this worksheet be revised into two separate worksheets for ease of use for future QAPPs.
5. **Worksheet #15, Project Action Limits and Laboratory-Specific Detection/Quantitation Limits, Pages 30 to 38:** For several of the compounds listed throughout this worksheet, a project action limit (PAL) is not provided. While the footnotes indicate that Regional Screening Levels (RSLs) do not exist for these compounds, future QAPPs should still discuss how these compounds will be evaluated.